
ADA Complementary Paratransit Program Plan

Key West Transit

PREPARED FOR



March 2026

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Document Change Log

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The purpose of this document is to establish the program plan for Key West Transit's Americans with Disabilities Act (ADA) complementary paratransit service ensuring full compliance with 49 CFR Part 37, Subpart F.

The City of Key West operates rural and commuter fixed-route bus service (e.g., Key West North and South Routes). Complementary paratransit service must extend within a $\frac{3}{4}$ -mile corridor of all (non-commuter) fixed routes, providing accessible, origin-to-destination transport for individuals unable to use fixed-route due to disability.

Goals:

- Ensure ADA compliance by the end of Fiscal Year (FY) 2026.
- Enhance mobility and independence for residents and visitors with disabilities.
- Integrate paratransit as part of a coordinated human service transportation network for Monroe County.

Regulatory and Policy Framework

This ADA policy is written to establish operating and service guidelines and procedures for the implementation of the requirements of the Americans with Disabilities Act of 1990, the U.S. Department of Transportation (U.S. DOT) regulations for implementing ADA (49 Code of Federal Regulations [CFR] Parts 27, 37 and 38), and applicable state laws and regulations. Key West Transit operates services on a fixed route basis. Key West Transit complies with ADA requirements with respect to such services. The Federal Requirements in 49 CFR Part 37, ADA Complementary Paratransit include service equivalent to fixed route services in coverage, hours, and fares. This plan is designed to meet the requirements of §37.139 Plan contents. The Florida Department of Transportation (FDOT) Transit Office oversees Key West Transit as a subrecipient of Section 5311 and other state and federal funds, including adherence to ADA Complementary Paratransit requirements.

Staffing and Administration

The entity submitting the ADA Complementary Paratransit Plan is Key West Transit located at 5701 College Road, Key West, FL 33040.

Contact person(s) for the plan are:

Name, Title	Contact Information
Rogelio Hernandez, Director of Transportation	(305) 809-3915
Vicente Rodriguez, Assistant Transit Supervisor	(305) 809-3916
Carolyn Haia, Transit Grant and Project Manager	(305) 809-3913

Training

Key West Transit ensures compliance with ADA service requirements through comprehensive trainings designed to equip vehicle operators and transit operators with the knowledge and skills to implement and adhere to established policies and procedures outlined in the ADA.

Current drivers receive comprehensive initial training that covers vehicle familiarization and core safety practices, including pre-trip, enroute, and post-trip inspections. Training also addresses safe vehicle operation, fitness for duty, defensive driving, and strategies for maintaining strong safety habits in adverse conditions. Passenger safety instruction focuses on proper procedures for boarding and alighting both ambulatory and non-ambulatory riders, securing mobility devices, managing difficult passenger situations, and maintaining security awareness. Drivers are additionally trained in vehicle evacuation and responding appropriately to emergency situations.

The training programs required for vehicle operators and transit personnel include:

Table 1 - Training Programs

Role	Trainings	Delivery Method	Frequency	Resources
Supervisors & Drivers	ADA basics, lifts/ramps, securement, rider assistance, emergency protocols	Classroom + Hands-on + eLearning	Initial + Annual + New equipment	National Rural Transit Assistance Program (RTAP)/eLearning Courses: ADA Driver Training, Wheelchair Securement and Lifts. Transportation Learning/eLearning Courses: Disability Etiquette for Transit Operators
Maintenance	Equipment inspection, troubleshooting, reporting	Hands-on + Classroom	Initial + As needed	Lively Paratransit Instructional Program

Role	Trainings	Delivery Method	Frequency	Resources
Dispatchers/ Customer Service	ADA scheduling rules, rider needs communication, emergency rerouting, ADA service rules, respectful communication, complaint handling	Classroom + Simulation	Initial + Annual	National RTAP/eLearning Courses: Dispatching and Scheduling Training for Rural Transit Systems
Director/ Managers	Compliance oversight, policy development, complaint resolution	Workshop + Compliance review	Initial + Annual	Federal Transit Administration (FTA) ADA Training/ National Transit Institute (NTI)/Rutgers FTA ADA Circular 4710.1 National RTAP ADA Toolkit 2024
Supervisor	Field observation, coaching, incident reporting	Classroom + Ride-along	Initial + Semi-annual	

Staff may participate in other training workshops and courses related to ADA regulations and complementary paratransit requirements. In February 2026, five staff members took part in the Easterseals Project Action virtual workshop “Navigating Accessibility: Understanding Fixed-Route and Paratransit ADA Requirements (Remote Mini-Workshop)”.

Complaint Process

When an ADA complaint is received, Key West Transit will promptly communicate its response to the complaint allegations, including its reasons for the response, to the complainant, and document the response. Key West Transit will advertise to the public the process for filing a complaint on its website.

Complaint records will be filed and stored in the City’s shared network for the required timeframes: detailed documentation for at least one year and a summary of ADA complaints for five years.

All complaints of discrimination on the basis of disability will be promptly and objectively investigated and forwarded to the Multimodal Transportation Coordinator and promptly and objectively investigated. Key West Transit will promptly communicate its response to the complaint allegations, including its reasons for the response to the complainant. The response will be documented. Corrective or disciplinary action will be taken for behavior prohibited by this policy, up to and including termination of employment.

See [Appendix: Complaint Form & Procedures](#)

TransCIP Reporting – FDOT Requirements

Key West Transit will report paratransit service complaints and grievance to FDOT on a quarterly basis via the state’s TransCIP reporting tool, as per F.S. 341.041 (16)(c):

"(c) Complaint and grievance processes for paratransit users, including a requirement that all reported complaints, grievances, and resolutions be reported to the department on a quarterly basis; and

(d) A requirement that the provisions of paragraphs (a), (b), and (c) must be included in any agreement between an entity receiving a grant or an agreement from the department and such entity's contractors or subcontractors that provide paratransit services."

Eligibility Determination Process

Each transit agency determines its own ADA complementary paratransit eligibility determination standards and process. Under federal requirements, paratransit eligibility isn't intended to be based on a medical diagnosis; it should be based on an individual's functional ability to independently use the fixed route transit system. A doctor's note is not required for a person to be approved for ADA complementary paratransit service; this is a local policy decision. Many transit agencies require verification by a medical or other professional, such as an occupational therapist, who can assess the person's abilities and under what circumstances (if any) the individual could use fixed route transit services. An appeals process must also be made available for persons who are determined ineligible or only eligible under certain conditions.

Key West Transit has established an application and certification process designed to ensure fair, timely, and nondiscriminatory determinations of ADA complementary paratransit eligibility. Eligibility is limited to individuals who meet one or more of the eligibility categories described in 49 CFR § 37.123, including individuals who cannot use an accessible fixed-route system under certain circumstances; or individuals whose specific impairment-related condition prevents travel to or from boarding locations.

The application process includes submission of a completed application form. Applications are accepted via mail or in-person. Key West Transit may utilize interviews or functional assessments where necessary to determine eligibility consistent with federal guidance.

The application process begins when an individual requests an ADA paratransit eligibility application from the transit agency. The application collects information regarding the applicant's disability, functional limitations, mobility aids used, and the specific conditions that may prevent the individual from accessing or navigating fixed-route transit services. Applicants must submit the application by mail, or in person to dispatcher/customer service coordinator or Carolyn Haia. A confirmation of receipt will be sent to the applicant by mail or e-mail. Key West Transit will provide assistance in completing the application upon request. Following receipt of a completed application, the transit agency conducts an eligibility determination. This review may include an in-person or functional assessment to evaluate the applicant's ability to travel to, from, and within the fixed-route system.

All information concerning the ADA paratransit eligibility process, application materials, notices, and determinations is made available in accessible formats. Accessible formats include large print, alternative electronic formats, or other reasonable accommodations necessary for the application process.

Applications for paratransit eligibility will be processed within 21 calendar days from submission of a completed application. During this time, Key West Transit will review the application, consult with medical professionals if needed, and make the certification determination. Key West Transit will notify the applicant in writing of the decision. The letter will state whether the applicant has been approved of service, the conditions of eligibility (if any) and if a personal care attendant is approved for travel as well. Key West Transit staff will meet applicants at an agreed-upon location for eligibility assessment and will arrange transportation for the applicant free of charge if necessary. Assessments may also take place at the Key West Transit administrative facility.

Individuals determined to be ADA paratransit eligible will receive a written documentation confirming their eligibility status through mail. Applicants have the option to pick up

documentation in person at Key West Transit office. Documentation includes an identification card that will include the individual's name, the name of the transit provider, the effective and expiration dates of eligibility (if applicable), and authorization for a personal care attendant (if applicable).

Eligibility Categories

The regulations require that ADA complementary paratransit be provided to the following categories of individuals:

A person with a disability who cannot navigate the transit system without assistance.

Referred to by the FTA as Eligibility Category 1, an individual under this category is unable, as the result of a disability, and without the assistance of another individual (except the operator of a wheelchair lift or other boarding assistance device), to board, ride, or disembark from any vehicle on the system which is readily accessible to and usable by individuals with disabilities. Examples of individuals who would qualify under this category include those with intellectual, cognitive, vision, or psychiatric disabilities who cannot independently navigate the fixed route system for some or all of their trips.

A person with a disability who requires an accessible vehicle when one is not available.

Referred to by the FTA as Eligibility Category 2, an individual under this category needs the assistance of a wheelchair lift or other boarding assistance device and is able to use accessible fixed route service, but the available fixed route service is not accessible. Eligibility under this category is necessary when accessible vehicles are not being used to provide service on the fixed bus route the individual wishes to use, or if a boarding or disembarking location (i.e., bus stop) is inaccessible and the lift or ramp cannot be deployed there (more information is available in the Vehicle and Facility Accessibility section of this Toolkit).

A person with a disability who is unable to reach the transit stop. Referred to by the FTA as Eligibility Category 3, an individual under this category has a specific impairment-related condition which prevents the individual from traveling to or from a bus stop in the fixed route system. An individual's specific impairment-related condition is a key factor. For example, for an individual who uses a wheelchair, a lack of sidewalks or barriers along the sidewalk (such as lack of curb ramps, or an object constraining the width of a sidewalk so as to be impassable) may prevent them from being able to travel to a bus stop. An individual who is unable to be outside in temperature extremes due to their disability may be prevented from traveling to a bus stop during those times of extreme temperatures. An individual with a vision disability may be unable to cross a complex intersection in order to get to or from a bus stop.

Types of Eligibility

Key West Transit will grant the following types of eligibility to individuals:

Unconditional Eligibility – An individual who is unable to use fixed route transit services under any circumstances requires unconditional eligibility, allowing the individual to make all trips using complementary paratransit.

Conditional Eligibility – An individual may be able to use the fixed route system for some trips. Transit agencies can establish conditional eligibility for those individuals and would only be

obligated to provide complementary paratransit for those trips that the individuals cannot make using fixed route, based on the conditions of the particular trip [Section 37.123(b)].

Temporary Eligibility – Temporary eligibility, for a defined period of time, can be granted to individuals who experience a temporary loss of functional ability that prevents them from using fixed route service [Section 37.123(c)]. For example, an individual may need to undergo two months of treatment for a health condition, resulting in severe fatigue that prevents use of the fixed route service for the duration of the treatment.

Eligibility Determination

Establishing and following an ADA complementary paratransit eligibility process that strictly limits eligibility to those individuals in Categories 1, 2 and 3 is key to ensuring that paratransit service is available for those who have a civil right to the service in accordance with the ADA.

Careful determination of eligibility for ADA complementary paratransit service is a legal requirement and can be an effective way to ensure that paratransit service is available for those who are entitled to it. Appropriate use of conditional eligibility can be particularly effective.

A transit provider may apply the conditions of an individual's eligibility to each trip request they make. Conditional eligibility, if implemented properly, helps to manage demand by identifying trips that can be made reasonably on the fixed route system, while preserving the individual's eligibility for paratransit service when their functional ability makes it necessary.

An example of this is when a person who uses a wheelchair may be able to reach the transit stop and use the accessible fixed route service on their own during mild weather. However, they may not be able to reach the transit stop when the sidewalks are covered in snow or ice. On those occasions, they are eligible to use the ADA complementary paratransit service, but on days when the path to the transit stop is clear and accessible, the individual should use the accessible fixed route service. Reservationists should be aware of the exact type of service the individual is eligible for when receiving requests.

To assist both the reservationist and the rider, conditions for the paratransit eligibility should be clearly defined. In our example above, it is better to state the exact conditions when the rider is unable to travel to the transit stop (when there is ice/snow on the sidewalks) rather than simply saying they are eligible "during the winter months" or "during bad weather." There are many days during the winter when there is no snow/ice on the ground, and the description "bad weather" is too vague. Clearly defining conditional eligibility is the most effective way to manage demand and ensure that riders who need paratransit are being served.

Eligibility Determination Process

The application and eligibility determination process for ADA complementary paratransit is often referred to as eligibility certification. While many transit systems use paper forms to collect applicants' information to determine eligibility, systems are increasingly moving to more personal, hands-on approaches. These approaches include phone or in-person interviews, functional assessments, or both. Section 37.125(g) of Part 37 requires the following elements for an ADA paratransit eligibility determination process:

If a rider makes the request, the transit agency must provide all information about the process, materials necessary to apply for eligibility, and notices and determinations concerning eligibility in accessible formats.

A functional assessment will be conducted by Vicente Rodriguez, Assistant Transit Supervisor within 7 calendar days of receipt of application. Carolyn will notify Vicente upon receipt of application.

If, by a date 21 days following the submission of a complete application, Key West Transit has not made a determination of eligibility, the applicant will be treated as eligible from the 22nd day and provided service until and unless the application is denied.

The eligibility determination must be put in writing. If the determination is that the individual is ineligible, the written communication must state the reasons for the finding.

Sample eligibility determination letters for Unconditional, Conditional, Temporary, and Ineligible determinations are provided in this document as appendices:

- **Sample Unconditional ADA Paratransit Eligibility Letter**
- **Sample Conditional ADA Paratransit Eligibility Letter**
- **Sample Temporary ADA Paratransit Eligibility Letter**
- **Sample Ineligible ADA Paratransit Eligibility Letter**

Eligibility Appeals

Transit agencies are required to establish an appeal process through which individuals who are denied ADA complementary paratransit eligibility can obtain review of the denial. Eligibility appeals must be handled by someone who did not make the original eligibility decision. Written appeals cannot be required (though a declaration of intent to appeal can be required to be written), and an opportunity to be heard must be part of the appeals process. See **Appendix: Appeals Process** for appeals process details. Without a written appeals decision within 30 days, the appellant will be provided with presumptive eligibility until such time a decision is made.

Service to Visitors

ADA complementary paratransit service is available to visitors on the same basis as it is provided to eligible riders. "On the same basis" means under all the same conditions, service criteria, etc., without distinction. For the period of a visit, and at least 21 days in any 365-day period, the visitor is treated exactly like an eligible local user, without any higher priority being given to either.

Visitors can provide documentation in one of two ways.

- The first is to present documentation from their "home" jurisdiction's paratransit system. The local provider will give "full faith and credit" to the visitor's ID card or other documentation from the other entity.
- If the individual has no such documentation, the local provider may require the provision of proof of visitor status (i.e., proof of residence somewhere else) and, if the individual's disability is not apparent, proof of the disability (e.g., a letter from a doctor or rehabilitation professional).

Once this documentation is presented and is satisfactory, Key West Transit will make service available on the basis of the individual's statement that they are unable to use the fixed route transit system.

Service Parameters

The City will not engage in any operational pattern or practice that significantly limits the availability of service to ADA-eligible individuals, including excessive waiting times to answer calls/requests, excessive late pickups or missed trips, or excessive trip lengths compared to fixed route service. The parameters described below further describe the manner in which these practices will be monitored and prevented.

Description of Fixed Route Services [§37.139(b)]

The Workforce Express is a fixed-route service operated by Key West Transit that provides transportation between Stock Island and Bahama Village. The route operates seven (7) days a week from 6:45 a.m. to 6:50 p.m. Effective July 1, 2024, the route was expanded to include additional stops at Lower Keys Medical Center, the apartment complexes in the 3900 block of South Roosevelt Boulevard, the Senior Center on Kennedy Drive, and the Overseas Market area. The service hours were also expanded to accommodate these additional locations.

In accordance with the ADA complementary paratransit service is provided within a $\frac{3}{4}$ -mile corridor on either side of the Workforce Express fixed route and around the end points of the route. This ADA complementary paratransit service operates during the same days and hours as the Workforce Express fixed-route service.

Refer to **Figure 1** for a map of the Workforce Express route and the corresponding ADA complementary paratransit service area.

Key West Transit maintains a unified fare structure for the Workforce Express. The standard one-way fare is \$2.00 for adults and \$1.00 for reduced-fare riders. Seniors with qualifying identification is \$0.50 per one-way trip. Children under five (5) rides free with a fare-paying adult. A one-day pass is available for \$4.00. A seven-day pass is \$8.00, or \$5.00 for reduced-fare riders and \$3.75 for seniors. A 31-day pass is \$25.00, or \$15.00 for both reduced-fare riders and seniors.

Key West Transit also operates the Lower Keys Shuttle as a commuter service seven (7) days a week from 5:40 a.m. to 10:00 p.m. Because this service functions as a commuter route, ADA complementary paratransit service is not required for this route.

Description of Paratransit Services

Key West Transit's paratransit services operate seven (7) days per week from 6:00 am to 8:00 pm on an origin-to-destination basis. Trip reservations may be made in person by adding the request to the pick-up log, by email, or by phone as indicated on the agency's website. Reservations must be made at least one (1) day in advance. Requests may also be submitted on holidays and after normal business hours. In accordance with applicable statute, the entity shall make reservation service available during at least all normal business hours of the entity's administrative offices, as well as during times comparable to normal business hours on a day when the entity's offices are not open prior to a service day.

Key West Transit utilizes four (4) cutaway buses dedicated to paratransit service; however, additional revenue vehicles may be used as all vehicles in the fleet are ADA accessible.

Service Area

The ADA complementary paratransit service is provided within a corridor extending at least three-quarters ($\frac{3}{4}$) of a mile on each side of each fixed-route bus route and within a three-quarter ($\frac{3}{4}$) mile radius of the ends of fixed routes within Key West. ADA complementary paratransit service is available throughout Key West wherever fixed-route service operates, consistent with the requirements of 49 CFR § 37.131(a). This includes all of Key West, Stock Island, and Key Haven. The map in [Figure 1](#) illustrates the required $\frac{3}{4}$ -mile buffer zone within which KWT is required to provide complementary paratransit service. Much like the frequently cited “donut hole coverage” policies typically applied in cities with grid street networks, KWT will in turn extend its service to destinations adjacent to and functionally connected with the island even where peripherally excluded from the required zone (e.g., the Stock Island Marina just outside the southeast edge of the buffer zone).



Figure 1 - KWT ADA Complementary Paratransit Service Area

Hours and Days of Operation

The ADA complementary paratransit service is provided during the same hours and days of operation as the fixed-route service operating within Key West Transit’s service area.

Trip scheduling

Trip reservations can be made within business hours by phone call (305) 809-3910 and may be scheduled in advance, including up to fourteen (14) days prior to the requested trip date. Service

is available for next-day trips following a request, not 24 hours in advance. Reservations may be made in person or via email (kwdot@cityofkeywest-fl.gov) or phone call reservation (on website).

Pickup times may be negotiated within one hour of the rider's request. The pickup window must be a reasonable allowance around the negotiated pickup time, either after the negotiated pickup time (0/+20 minutes) or bracketed around the negotiated pickup time (-15+15 minutes). The window cannot exceed 30 minutes.

On holidays/after hours. Statute: The entity shall make reservation service available during at least all normal business hours of the entity's administrative offices, as well as during times, comparable to normal business hours, on a day when the entity's offices are not open before a service day.

No Trip Purpose Restrictions or Prioritization

Key West Transit does not impose restrictions or priorities based on trip purpose. ADA complementary paratransit service is available for all trip purposes, including employment, medical, educational, recreational, or personal travel

Fare Policy

Key West Transit ADA complementary paratransit service fare does not exceed twice the full fare charged (\$2) for a comparable fixed-route trip at a similar time of day, in accordance with 49 CFR § 37.131(c). Therefore, the ADA complementary paratransit service fare is established at \$4 per trip. Personal Care Attendants accompanying ADA eligible individuals are transported without charge, consistent with federal ADA requirements

No-Show Policy

To ensure that Key West's ADA complementary paratransit service remains reliable, efficient, and available to all eligible riders, Key West Transit has established a no-show policy to discourage excessive no-shows and late cancellations.

A no-show occurs when a vehicle arrives within the rider's scheduled pickup window and waits at least five (5) minutes, but the rider fails to board the vehicle. A late cancellation occurs when a rider cancels a scheduled trip less than one (1) hour before the beginning of the pickup window. For the purposes of this policy, late cancellations are treated the same as no-shows.

When a pattern or practice of excessive missed trips are identified, Key West Transit may apply progressive administrative action. The first occurrence will result in a written warning. A second occurrence may result in a suspension of service for up to seven (7) days. A third occurrence result in a suspension of up to fourteen (14) days. Subsequent occurrences may result in a suspension of up to thirty (30) days. Before implementation of any suspension, the rider will receive written notification identifying the dates and circumstances of the recorded no-show or late cancellations, the proposed suspension period, and instructions for requesting a review or filing an appeal. Refer to **Appendix: No-Show and Cancellation Policy**.

Capacity Constraints Policy

The City of Key West Transit explicitly prohibits capacity constraints, consistent with ADA requirements and is committed to operating its complementary paratransit service without

capacity constraints, in full compliance with the ADA and FTA regulations. The agency will not establish waiting lists for ADA-eligible trips, limit the number of trips an eligible rider may request, or otherwise restrict access through trip caps, patterns of trip denials, missed trips, excessively long telephone hold times, or excessive trip negotiation that results in riders being unable to travel when needed. Service will be scheduled and delivered so that ADA-eligible riders can obtain trips at times comparable to the fixed-route system, within the required service area and hours of operation, spare vehicles can be used from fixed route if needed.

§37.131(f) prohibits a transit agency from operating complementary paratransit service in a manner that significantly limits the availability of the service through a “pattern or practice” of actions. Key West Transit will monitor key performance indicators (including trip denials, on-time performance, call center performance, and customer complaints) and will take corrective action as necessary to prevent and remedy any operational practices that could result in prohibited capacity constraints.

Operational Patterns

The City of Key West Transit will not engage in any operational pattern or practice that significantly limits the availability of complementary paratransit service to ADA-eligible individuals, in accordance with the ADA and FTA regulations. This includes, but is not limited to, practices that result in excessive waiting time to answer calls or respond to trip requests, excessive late pickups or missed trips, or excessive trip lengths when compared to the travel time required on the fixed-route system for a similar trip. The City will design and manage its paratransit operations to avoid these and other capacity-related barriers by monitoring call center performance, on-time performance, trip duration, and customer complaints, and will promptly identify and correct any emerging patterns or practices that could restrict ADA-eligible riders’ ability to use the service as intended.

Subscription Trips

Key West Transit does not provide paratransit trips on a subscription basis at this time.

Personal Care Attendants

Key West Transit will provide ADA complementary paratransit service for a personal care attendant (PCA) traveling with the eligible rider. The need to travel with a PCA will be determined by the applicant and noted as part of the eligibility determination process. It is important to note that the PCA may not directly be needed for transportation but may be needed at the individual’s trip destination (for example, to assist with grocery shopping) and thus need for a PCA will not be limited to those individuals who require assistance in traveling. An individual who is certified as needing a PCA cannot be denied service if they choose to travel without a PCA, and may not be required to travel with the same PCA for every trip. A PCA is not charged a fare.

Companions

An ADA complementary paratransit rider is permitted to travel with at least one companion, and more than one on a space-available basis. Companion passengers pay the same fare as ADA riders. The eligible ADA rider shall reserve space for the companion(s) when the rider reserves the ride. Any companions traveling with the eligible individual must share the same trip origin

and destination as the eligible individual. The companion is in addition to any PCA with which the rider may travel.

Origin-to-Destination Service and Passenger Assistance

ADA complementary paratransit services will be provided on a curb-to-curb basis. Key West Transit drivers will assist ADA complementary paratransit riders with boarding and disembarking from vehicles and in securing their mobility devices. All drivers who operate ADA complementary paratransit services will be proficiently trained in passenger assistance and sensitivity towards individuals with disabilities.

Riders will be required to travel to the curb outside of their trip origin in time for their scheduled pick-up. Riders who require additional assistance in the form of door-to-door service in order to use the ADA complementary paratransit may request a modification of this policy by contacting the ADA coordinator at (305) 809-3867. In such cases, the driver will provide assistance on a door-to-door basis. This ensures that Key West Transit meets the ADA requirement to provide service on an "origin to destination" basis. While limited assistance in guiding a passenger from their door to the curb may be provided on a case-by-case base, this must be prearranged and indicated when the trip is scheduled.

The staff of Key West Transit will not lift a passenger, leave a vehicle unattended or out of visual observation for a lengthy period of time, enter a rider's home, care for service animals, operate a power wheelchair, provide personal care attendant (PCA) service, or take actions that would be clearly unsafe. If more extensive assistance is needed by the individual than Key West Transit can provide as a provider of public transportation, the individual will be responsible for arranging personal assistance. Staff of Key West Transit will work with the individual and/or the rider's caregiver/social worker to clarify parameters of the assistance provided by the driver and formally document this in a letter sent to the individual.

Compliance and Performance Monitoring

Key West Transit will establish measurable service standards to assess ADA Complementary Paratransit is being provided on a comparable basis.

On-Time Performance

The City will ensure that complementary paratransit is provided in a timely manner such that there is no pattern or practice of late pickups or missed trips that significantly limits service availability for ADA-eligible riders.

A trip is considered “on time” if the vehicle arrives within the agency’s defined pickup window (for example, from 15 minutes before to 15 minutes after the scheduled pickup time).

The City will establish an on-time performance target (e.g., at least 90–95% of trips on time) and will monitor for any recurring pattern of late pickups or missed trips.

Actual pickup times will be recorded for all trips using manifests and scheduling/dispatch software. Excessive trip lengths compared to fixed route service will also be monitored through these same procedures.

Reporting and Corrective Actions: Monthly reports will show on-time performance and identify recurring late-trip patterns (e.g., by time of day, geographic area, or driver/route).

If on-time performance falls below the standard or if patterns of late or missed trips are identified, the City will conduct a root-cause analysis and adjust schedules, staffing, routing, and/or training to correct the problem and prevent recurrence.

Denials

The City will ensure that there is no pattern or practice of trip denials for ADA-eligible riders who make timely requests, in order to avoid prohibited capacity constraints.

Monitoring Process

Definition: A denial occurs when an ADA-eligible rider requests a trip in accordance with the agency’s reservation policies and the City cannot schedule the trip at any time within the allowed scheduling window.

Standard: The City’s goal is zero ADA trip denials for eligible requests and no pattern or practice of denials that would indicate capacity constraints.

Data Collection: All trip requests (including date, time of request, requested pickup time, scheduled time, and whether the trip was accommodated or denied) will be recorded, along with the reason if a trip is denied.

Reporting and Corrective Action:

Monthly reports will summarize the number and rate of denials and identify any patterns by time of day, day of week, or area.

Any ADA-eligible trip denial will be reviewed to confirm its classification and cause. Where denials indicate capacity limitations, the City will adjust vehicle deployment, staffing levels, or scheduling practices to remove capacity constraints.

Response Time (Telephone Access and Reservations)

The City will ensure that riders can make reservations without experiencing excessive call waiting/hold times or other barriers that could significantly limit access to service.

Monitoring Process – Excessive Call Waiting Times

Definition: Response time will be measured primarily as (1) average and maximum time to answer calls to the reservation and customer service lines, and (2) the rate at which callers abandon calls before reaching an agent.

Standard: The City will establish measurable standards (for example, a specified percentage of calls answered within a defined time and a maximum acceptable abandonment rate) and will monitor for any patterns of excessive waiting time to answer calls.

Data Collection: Phone system and call center reports will be used to track total calls, answer times, and abandoned calls.

Reporting and Corrective Action:

- Monthly reports will identify peak periods and any recurring excessive hold times or high abandonment rates.
- If performance falls below standards or indicates a pattern of excessive waiting times, the City will adjust staffing levels, call routing, or call-handling procedures to ensure timely access to reservations.

Customer Satisfaction

The City will use rider feedback to identify and correct service issues that may indicate capacity constraints or other barriers to ADA-compliant service, including excessive trip lengths or inconsistent service quality.

Monitoring Process

- **Feedback Channels:** The City will solicit and receive feedback through rider surveys, complaint and compliment processes (phone, mail, email, online), and engagement with advisory groups, including riders with disabilities.
- **Focus Areas:** Customer feedback will be reviewed for concerns related to timeliness (including late pickups and long trips), access to reservations, operator conduct, and vehicle condition.
- **Data Collection:** All complaints, compliments, and suggestions will be logged with date, type of issue, and resolution, and will be analyzed for recurring themes.
- **Reporting and Corrective Action:**
 - Periodic (e.g., annual or semi-annual) surveys and regular complaint reports will be summarized and reviewed.

- When feedback indicates recurring issues—such as excessive trip lengths compared to fixed-route travel times, repeated late pickups, or barriers to making reservations—the City will investigate and implement operational or policy changes needed to address the problem and prevent patterns that could restrict service availability.

Continuous Compliance and Improvement

The City of Key West Transit will document performance standards, methods, and results; will review them regularly; and will adjust service design, operating practices, and staffing levels as needed to prevent any operational pattern or practice that functions as a capacity constraint for ADA-eligible riders. Performance monitoring results will inform planning, budgeting, and policy decisions to ensure that complementary paratransit remains fully compliant with ADA regulations and responsive to the needs of individuals with disabilities.

Continuous improvement process (corrective actions, stakeholder feedback, annual review)

- Post-launch performance monitoring
- Stakeholder review and feedback loop
- Adjustments based on demand, service gaps, or regulatory changes
- As part of annual update process
- As part of FDOT oversight processes

Public Outreach and Coordination

The City of Key West Transit will conduct two community information sessions to inform system users about the new service. One session was held at the Intermodal Center, where pamphlets describing the new services were distributed to existing riders to increase awareness and understanding. In addition, KWT staff will present the service changes at the June 9, 2026, Transportation Disadvantaged Local Coordinating Board meeting.

The Complementary Paratransit Services Plan will be posted on the agency's website for a 30-day public comment period. Comments received during this period were reviewed and addressed by agency staff within 30 days, provided the commenter supplied contact information. Comments received during this period will be appended to this document.

Implementation Timeline

The implementation of the complementary paratransit services is structured to ensure compliance with the Americans with Disabilities Act (ADA), Federal Transit Administration (FTA) guidance, and meaningful public involvement. The following phased timeline outlines the key activities from planning through post-implementation evaluation.

Phase 1 – Planning and Internal Coordination (January – May 2025)

During this phase, City of Key West Transit (KWT) finalized service design elements, including route alignments, schedules, service coverage, and eligibility criteria for complementary paratransit consistent with ADA requirements (e.g., service area within $\frac{3}{4}$ mile of fixed routes, comparable hours and days of service, and no capacity constraints). Staff coordinated internally with operations, maintenance, dispatch, and customer service teams to confirm operational feasibility, vehicle assignments, operator availability, and necessary schedule adjustments. Draft policies and procedures for ADA paratransit eligibility determination, reservations, no-shows, and trip denials were developed in accordance with FTA and ADA regulations. Additionally, leadership at the agency facilitated multiple discussions with Monroe County and Guidance Care Center.

Phase 2 – Public Information and Outreach (March – May 2026)

To inform the public and system users in a timely and accessible manner, KWT conducted two community informational sessions prior to implementation. One session was held at the Intermodal Center, where pamphlets describing the new services were distributed to existing riders to increase awareness and understanding. In addition, KWT Transit staff presented the proposed changes and complementary paratransit elements at the June 9, 2026 Transportation Disadvantaged Local Coordinating Board meeting to solicit feedback from stakeholders, including riders with disabilities and social service agencies. All public-facing materials were prepared in accessible formats, and alternative formats (e.g., large print, translated materials) were made available upon request.

The Complementary Paratransit Services Plan was posted on the agency's website for a 30-day public comment period, consistent with FTA expectations for meaningful public involvement in major service or policy changes. During this period, the public, including individuals with disabilities and advocacy groups, were encouraged to review the plan and submit comments via email, mail, or phone. Comments received during this period were logged, reviewed, and addressed by agency staff within 30 days, provided the commenter supplied contact information for response. Where appropriate, revisions were made to the plan to enhance compliance with ADA requirements and to respond to identified community needs.

On April 1, 2026 this plan was adopted at the City of Key West, City Council Meeting.

Phase 3 – Finalization of Policies, Procedures, and Training (May 2026)

Following the close of the public comment period, KWT finalized the Complementary Paratransit Services Plan, including eligibility procedures, service parameters (service area, hours, fares,

reservation windows), and policies regarding no-shows and late cancellations, in alignment with ADA and FTA guidance. Administrative procedures were updated to ensure timely eligibility determinations, provision of reasonable modifications, and proper handling of complaints and appeals. During this phase, KWT conducted operator and staff training on ADA requirements, disability awareness, passenger assistance techniques, and the specific operational procedures for complementary paratransit. Customer service staff were trained to accurately communicate eligibility criteria, reservation procedures, and riders' rights and responsibilities.

Phase 4 – Service Launch (June 2026)

Upon completion of training and finalization of policies, KWT implemented the new fixed-route service and began providing complementary paratransit service consistent with the ADA. The launch date was publicized in advance through the agency's website, social media, onboard notices, and community partners to ensure riders with disabilities and other stakeholders were aware of the start of service. On the launch date, KWT ensured that: (1) complementary paratransit service was available within the required service area and during all hours that the related fixed-route services were operating; (2) reservation and scheduling systems were fully functional; and (3) no capacity constraints (e.g., trip caps, long waiting lists, or excessive denials) impeded riders' access to ADA paratransit.

Phase 5 – Post-Implementation Monitoring and Adjustment (July 2026 and Ongoing)

Following implementation, KWT initiated a monitoring period to assess service performance, customer satisfaction, and ongoing compliance with ADA and FTA standards. Performance indicators included on-time performance for paratransit trips, trip denials or missed trips, call center performance, adherence to service area and hours, and the timeliness of eligibility determinations and complaint resolution. Feedback from riders, including individuals with disabilities and service agencies, was actively solicited and evaluated. Where monitoring identified gaps or emerging issues, KWT adjusted service levels, procedures, or staff training to maintain compliance and improve the rider experience. This continuous review process supports long-term adherence to ADA requirements and FTA expectations and ensures that complementary paratransit service remains responsive to community needs.

Demand Estimation

This section presents an estimate of demand for comparable paratransit service by ADA eligible individuals and a brief description of the demand estimation methodology used. Demand estimations were based on population data, disability statistics, and peer agency benchmarks, along with the 2013 report by the Center for Urban Transportation Research, University of South Florida, National Center for Transit Research (NCTR), *Forecasting Paratransit Services Demand – Review and Recommendations*.

Transportation Disadvantaged (TD) population groups include disabled persons, elderly and low-income persons and children. Disability refers to physical or mental limitations that may limit a person's ability to access transportation. There are overlaps among these categories of TD populations. This ADA Complementary Paratransit Plan estimates demand by disaggregating the disability populations from the other groups of TD populations to find a total estimated number of 8,469 persons with disabilities. Using an estimated daily trip rate of 0.049 trips per person, 362 service days per year, this would result in an annual trip demand of 40,906. There are two factors likely to reduce actual demand relative to this estimate:

- 1) The demand estimation methodology uses countywide Census data, as disability statistics are not available at the city-level geographic unit of analysis
- 2) Per its 2023-2024 Annual Performance Report to the Commission for the Transportation Disadvantaged, Guidance/Care Center provided 34,583 trips in 2024. In the case that there is minimal change to the quantity and nature of CTC's involvement in the coordinated transportation system, it is reasonable to expect that demand for KWT complementary paratransit will be limited by this existing supply, though it is unknown at this time what proportion of riders may choose to switch services.

Budget and Funding Strategy

A budget for comparable paratransit service, including capital and operating expenditures over five years, is included in this section. As of 2024 National Transit Database annual report, KWT's operating cost per passenger trip was \$14.39, though this figure includes fixed route service for which costs are generally lower. Costs are provided as estimates assuming 5,000 trips per year adjusted for the partial year FY2026 from June launch through FY end September 30, and an estimated annual 3% inflation rate from FY2028 on.

Table 2 - Five-Year Capital & Operating Expenditures

	FY2026 (partial)	FY2027	FY2028	FY2029	FY2030
Operating Expenses	\$23,983	\$71,950	\$74,109	\$76,332	\$78,622
Capital Expenses	-	-	-	-	-

Capital expenses are shown as null because while four vehicles are planned for replacement over the five-year timeframe, those vehicles are also used for on-demand service outside of ADA Complementary Paratransit service which will likely represent a higher proportion of usage. Technology and other capital needs may become apparent after implementation, at which point this budget will be updated to reflect those changes. Federal, state, and local revenues used to fund this service will include FTA Section 5311 and the State Public Transit Block Grant program.

Cost-control mechanisms including trip coordination and scheduling optimization will be implemented as the service matures and demand is better ascertained through actual service metrics.

Appendices

Plan Requirements Checklist

ADA Paratransit Eligibility Application

Sample Unconditional ADA Paratransit Eligibility Letter

Sample Conditional ADA Paratransit Eligibility Letter

Sample Temporary ADA Paratransit Eligibility Letter

Sample Ineligible ADA Paratransit Eligibility Letter

No-Show and Cancellation Policy

Appeals Process

Complaint Form & Procedures

Contact List of Coordinating Providers

Resources

Plan Requirements Checklist

Requirement	Section Hyperlinks (ctrl+click)
(a) Identification of the entity submitting the plan, specifying:	
(a)(1) name and address	Staffing and Administration
(a)(2) Contact person for the plan, with telephone number and fax number, if applicable.	Staffing and Administration
(b) A description of the fixed route system, including:	
(b)(1) A description of the service area, route structure, days and hours of service, fare structure, and population served. This includes maps and tables, if appropriate;	Description of Fixed Route Services
(b)(2) The total number of vehicles (bus, van, or rail) operated in fixed route service (including contracted service), and percentage of accessible vehicles and percentage of routes accessible to and usable by persons with disabilities, including persons who use wheelchairs;	Description of Fixed Route Services
(b)(3) Any other information about the fixed route service that is relevant to establishing the basis for comparability of fixed route and paratransit service.	Description of Fixed Route Services No additional fixed-route features (e.g., express, limited-stop, or premium services) alter the basis for comparability between fixed route and ADA complementary paratransit. All routes included in this plan operate as local services with regular stops.
(c) A description of existing paratransit services, including:	
(c)(1) An inventory of service provided by the public entity submitting the plan	Description of Paratransit Services

Requirement	Section Hyperlinks (ctrl+click)
(c)(2) An inventory of service provided by other agencies or organizations, which may in whole or in part be used to meet the requirement for complementary paratransit service	The Guidance/Care Center TD services provide transportation for transportation disadvantaged populations. These services are not counted toward KWT's ADA complementary paratransit obligations, and ADA eligible riders remain entitled to KWT's complementary paratransit regardless of TD service availability. Guidance/Care Center made the determination that the organization is unable to adhere to ADA complementary service standards at this time.
(c)(3) A description of the available paratransit services in paragraphs (c)(2) and (c)(3) of this section as they relate to the service criteria described in § 37.131 of this part of service area, response time, fares, restrictions on trip purpose, hours and days of service, and capacity constraints; and to the requirements of ADA paratransit eligibility	The Guidance/Care Center services are not counted toward KWT's ADA complementary paratransit obligations and are not relied upon for comparability.
(d) A description of the plan to provide comparable paratransit, including:	
(d)(1) An estimate of demand for comparable paratransit service by ADA eligible individuals and a brief description of the demand estimation methodology used;	Demand Estimation

Requirement	Section Hyperlinks (ctrl+click)
(d)(2) An analysis of differences between the paratransit service currently provided and what is required under this part by the entity(ies) submitting the plan and other entities, as described in paragraph (c) of this section;	Existing service does not meet the ADA criteria. The new plan will fill the gap as described in the Description of Paratransit Services .
(d)(3) A brief description of planned modifications to existing paratransit and fixed route service and the new paratransit service planned to comply with the ADA paratransit service criteria	Introduction of new services are described in Description of Paratransit Services .
(d)(4) A description of the planned comparable paratransit service as it relates to each of the service criteria described in § 37.131 of this part—service area, absence of restrictions or priorities based on trip purpose, response time, fares, hours and days of service, and lack of capacity constraints.	Description of Paratransit Services
(d)(5) A timetable for implementing comparable paratransit service, with a specific date indicating when the planned service will be completely operational. The plan shall include milestones for implementing phases of the plan, with progress that can be objectively measured yearly;	Implementation Timeline
(d)(6) A budget for comparable paratransit service, including capital and operating expenditures over five years.	Budget and Funding Strategy
(e) A description of the process used to certify individuals with disabilities as ADA paratransit eligible. At a minimum, this must include	
(e)(1) A description of the application and certification process, including	Eligibility Determination Process
(e)(1)(i) The availability of information about the process and application materials in accessible formats	Eligibility Determination Process
(e)(1)(ii) The process for determining eligibility according to the provisions of §§ 37.123-37.125 of this part and notifying individuals of the determination made	Eligibility Determination
(e)(1)(iii) The entity's system and timetable for processing applications and allowing presumptive eligibility	Eligibility Determination Process

Requirement	Section Hyperlinks (ctrl+click)
(e)(1)(iv) The documentation given to eligible individuals	Sample Unconditional ADA Paratransit Eligibility Letter Sample Conditional ADA Paratransit Eligibility Letter Sample Temporary ADA Paratransit Eligibility Letter Sample Ineligible ADA Paratransit Eligibility Letter
(e)(2) A description of the administrative appeals process for individuals denied eligibility.	Appeals Process
(e)(3) A policy for visitors, consistent with § 37.127 of this part.	Service to Visitors
(f) Description of the public participation process including	
(f)(1) Notice given of opportunity for public comment, the date(s) of completed public hearing(s), availability of the plan in accessible formats, outreach efforts, and consultation with persons with disabilities	Public Outreach and Coordination
(f)(2) A summary of significant issues raised during the public comment period, along with a response to significant comments and discussion of how the issues were resolved	TBD, to be finalized after the comment period is complete.

Requirement	Section Hyperlinks (ctrl+click)
(g) Efforts to coordinate service with other entities subject to the complementary paratransit requirements of this part which have overlapping or contiguous service areas or jurisdictions	Key West Transit's service area does not overlap with or lie contiguous to any other public fixed-route system subject to ADA complementary paratransit requirements. Therefore, there are no opportunities or obligations for cross-boundary ADA paratransit coordination at this time.
(h) The following endorsements or certifications:	
(h)(1) A resolution adopted by the board of the entity authorizing the plan, as submitted.	Planned for April 1, 2026
(h)(2) In urbanized areas, certification by the Metropolitan Planning Organization (MPO) that it has reviewed the plan and that the plan is in conformance with the transportation plan developed under the Federal Transit/Federal Highway Administration joint planning regulation (49 CFR part 613 and 23 CFR part 450). In a service area which is covered by more than one MPO, each applicable MPO shall certify conformity of the entity's plan. The provisions of this paragraph do not apply to non-FTA recipients	Not applicable. Service provided in a rural area.
(h)(3) A certification that the survey of existing paratransit service was conducted as required in § 37.137(a) of this part;	KWT certifies that it has surveyed the area covered by this plan to identify any public or private entities that provide paratransit or other special transportation services for ADA paratransit eligible individuals within the service area, in accordance with §37.137(a).

Requirement	Section Hyperlinks (ctrl+click)
(h)(4) To the extent service provided by other entities is included in the entity's plan for comparable paratransit service, the entity must certify that:	
(h)(4)(i) ADA paratransit eligible individuals have access to the service	N/A
(h)(4)(ii) The service is provided in the manner represented	N/A
(h)(4)(iii) Efforts will be made to coordinate the provision of paratransit service by other providers	N/A
(i) A request for a waiver based on undue financial burden, if applicable. The waiver request should include information sufficient for FTA to consider the factors in § 37.155 of this part. If a request for an undue financial burden waiver is made, the plan must include a description of additional paratransit services that would be provided to achieve full compliance with the requirement for comparable paratransit in the event the waiver is not granted, and the timetable for the implementation of these additional services	N/A – no undue financial burden waiver is being requested.
(j) Annual plan updates	
(j)(1) The annual plan updates shall include information necessary to update the information requirements of this section. Information submitted annually must include all significant changes and revisions to the timetable for implementation.	Annual plan updates will be integrated into existing review processes for other procedures (e.g., the System Safety Program Plan, Transit Development Plan, etc.)
(j)(2) If the paratransit service is being phased in over more than one year, the entity must demonstrate that the milestones identified in the current paratransit plans have been achieved. If the milestones have not been achieved, the plan must explain any slippage and what actions are being taken to compensate for the slippage.	N/A – phasing beyond one year is not planned.

Requirement	Section Hyperlinks (ctrl+click)
(j)(3) The annual plan must describe specifically the means used to comply with the public participation requirements, as described in § 37.137 of this part.	For each annual ADA paratransit plan update, KWT will provide an opportunity for public comment by posting proposed updates on the agency website, notifying the Transportation Disadvantaged Local Coordinating Board and relevant stakeholders, and making materials available in accessible formats. Comments will be accepted via email, mail, or phone and addressed as part of the final annual update.

DRAFT – Please replace with KWT application



ADA Paratransit Eligibility Application

Thank you for your interest in the Americans with Disabilities Act (ADA) Complementary Paratransit program which is a shared-ride door to door service provided to eligible riders.

Please be sure to complete all information requested and sign where appropriate. The Medical section must be completed and signed by a Licensed Professional (familiar with your disability or health condition and your functional abilities). If necessary, further information may be requested to determine eligibility.

Eligibility Types & Recertification Requirements:

Permanent (continued) Eligibility - Automatic recertification will be considered for individuals who cannot use Key West bus service under any circumstances and/or whose disability is unlikely to improve. Customers who have been provided permanent eligibility will receive a verification document to update/recertify their information and note any changes in their travel abilities or needs **every three years from date of the initial eligibility**.

Standard Eligibility - All customers granted approval under this category (unconditional/conditional) will be required to recertify **every two years from date of the initial eligibility**.

Temporary Eligibility - All customers granted approval under this category will be required to recertify based on the length of time granted in the approval.

Customers that are ADA eligible with another transit provider may use Key West Transit ADA Complementary Paratransit by providing documentation of their eligibility status prior to needing to travel. This same right applies to Key West Transit customers traveling to other communities that offer complimentary ADA paratransit services.

Disclaimer: Completing this application does not automatically certify you for paratransit services. Some applicants may be required to go through a functional assessment to assist us in determining your level of eligibility. All applicants will be notified by mail of the outcome of their application. Processing may take up to 21 days from receipt of a completed application to include completion of a Functional Assessment if required.

Mail or bring your completed application to:

City of Key West Department of Transportation / Key West Transit
5701 College Road
Key West, FL 33040

Key West Transit ADA Complementary Paratransit Eligibility Application

New Applicant ☐Recertification ☐

Section 1 - Personal Information

Last Name: _____ First Name: _____ Middle Initial: _____

Male ☐ Female ☐ Other / Prefer not to say ☐ Date of Birth (mm/dd/yyyy): _____

Home Address: _____ City: _____ State: _____ ZIP: _____

Mailing Address (If Different from Above): _____

Emergency Contact Name: _____ Relationship: _____

Phone Number: _____

Please select all that apply to you, even if you only use them sometimes:

☐	Manual Wheelchair	☐	Service Animal
☐	Manual Scooter	☐	Prosthesis
☐	Powered Scooter	☐	Boot
☐	Walker (collapsible)	☐	Hearing Aide(s)
☐	Walker (with seat)	☐	Portable Oxygen Device
☐	Crutches	☐	Care Attendant
☐	Leg Brace(s)	☐	Other

Please describe "Other" if selected:

Explain nature of disability preventing the applicant from using Fixed Route Bus Service:

Is this condition temporary? Yes ☐ No ☐

If yes, expected duration: _____

Section 2 – Travel Information

**1. Do you currently use any of the following types of transportation?
(Check all that apply)**

- ☐ Key West fixed route bus
- ☐ Taxi
- ☐ Transportation Network Company (TNC – e.g., Uber, Lyft, etc.)
- ☐ Dialysis transportation provided by your clinic
- ☐ Other (please specify): _____

2. If you do not currently use Key West fixed route bus service, please tell us why:

3. How do you currently travel to your most frequent destinations?

4. What are the three places you travel to most often? (Please list addresses if possible.)

1) _____

2) _____

3) _____

5. What days and times do you usually travel? (Check all that apply)

- ☐ Weekdays – Morning
- ☐ Weekdays – Afternoon
- ☐ Weekdays – Evening
- ☐ Weekend – Morning
- ☐ Weekend – Afternoon
- ☐ Weekend – Evening

6. Do you need assistance getting from your door to the vehicle?

- ☐ Yes ☐ No

If yes, please explain:

SECTION 4 – Request for Professional Verification

In order to confirm eligibility, it may be necessary for Key West Transit to contact the applicant's healthcare professional. Please complete the following form.

Please select applicable professional title:

☐	Physician	☐	Physician Assistant
☐	Psychiatrist	☐	Mobility Specialist
☐	Chiropractor	☐	Registered Nurse
☐	Rehabilitation Professional	☐	Other _____ (Please Specify)

Health Care Professional Name: _____

Address: _____ City: _____ State: _____ ZIP: _____

Certification of Applicant

I, _____

(print name)

Certify that the information contained in this application is true and complete to the best of my knowledge. The purpose of this application is to determine if I am eligible to use ADA Paratransit Services, or if at times I can ride the Key West Transit Fixed Route Bus. I understand that any falsification of information on this form may lead to disqualification of eligibility.

Signature

Date

END OF APPLICATION

Sample Unconditional ADA Paratransit Eligibility Letter

Key West Transit
5701 College Rd, Key West
(305) 809-3910

Date: Month-Date-Year

[Insert Applicant's Name]
[Insert Applicant's Address]
[Insert Applicant's City, State, and Zip]:

Re: ADA Paratransit Eligibility Determination

Dear XXXXXX,

Thank you for submitting your application for ADA complementary paratransit service with Key West Transit. We have completed our review of your application, and after careful evaluation pursuant to the Americans with Disabilities Act (ADA) regulations (49 C.F.R. Part 37, Subpart F), we have determined that:

You are **UNCONDITIONALLY ELIGIBLE** for ADA complementary paratransit service. This means you are eligible to use complementary paratransit service for all trips within the service area because you cannot reasonably use fixed-route service under any circumstances.

Your eligibility is valid through [Insert Expiration Date], after which you will need to request a continuation of your eligibility. We will notify you in advance of this expiration date to remind you to reapply and will send you a recertification request form at that time.

Enclosed is a copy of the rider's guide, which explains the complementary paratransit service and how to use it. The rider's guide includes helpful tips for using the service. If you have any questions about the service, please call our Customer Service office at (305) 809-3910.

In addition to using the complementary paratransit service, this letter of eligibility also entitles you to use similar ADA paratransit services at other transit systems across the country as a visitor for up to 21 days per year. Simply provide the transit agency in the city you plan to visit with a copy of this letter to obtain approval to travel as a visitor.

If you have any questions about this determination of eligibility, please call our ADA Paratransit Eligibility office at (305) 809-3910.

Sincerely,

Sample Conditional ADA Paratransit Eligibility Letter

Key West Transit
5701 College Rd, Key West
(305) 809-3910

Date: Month-Date-Year

[Insert Applicant's Name]
[Insert Applicant's Address]:
[Insert Applicant's City, State, and Zip]:

Re: ADA Paratransit Eligibility Determination

Dear XXXXXX,

Thank you for submitting your application for ADA complementary paratransit service with Key West Transit. We have completed our review of your application, and after careful evaluation pursuant to the Americans with Disabilities Act (ADA) regulations (49 C.F.R. Part 37, Subpart F), we have determined that:

You are **CONDITIONALLY ELIGIBLE** for ADA complementary paratransit service. This means you can use fixed-route service under certain conditions and are eligible to use complementary paratransit service when you are not able to use fixed-route service. Please review the attached, which describe the conditions under which you can use the complementary paratransit service as well as the basis for our determination.

Your eligibility is valid through [Insert Expiration Date], after which you will need to request a continuation of your eligibility. We will notify you in advance of this expiration date to remind you to reapply and will send you a recertification request form at that time.

Enclosed is a copy of the rider's guide, which explains the complementary paratransit service and how to use it. If you have any questions about the service, please call our Customer Service office at (305) 809-3910.

In addition to using [name of complementary paratransit service], this letter of eligibility also entitles you to use similar ADA paratransit services at other transit systems across the country as a visitor for up to 21 days per year. Simply provide the transit agency in the city you plan to visit with a copy of this letter to obtain approval to travel as a visitor.

If you have any questions about this determination of eligibility, please call our ADA Paratransit Eligibility office at (305) 809-3910.

Sincerely,

Sample Temporary ADA Paratransit Eligibility Letter

Key West Transit
5701 College Rd, Key West
(305) 809-3910

Date: Month-Date-Year

[Insert Applicant's Name]
[Insert Applicant's Address]
[Insert Applicant's City, State, and Zip]

Re: ADA Paratransit Eligibility Determination

Dear XXXXXX,

Thank you for submitting your application for ADA complementary paratransit service with Key West Transit. We have completed our review of your application, and after careful evaluation pursuant to the Americans with Disabilities Act (ADA) regulations (49 C.F.R. Part 37, Subpart F), we have determined that:

You are **TEMPORARILY ELIGIBLE** for ADA complementary paratransit service. This means you are eligible for a limited time to complementary paratransit service for all trips within the service area because you cannot reasonably use fixed-route service under any circumstances.

Your eligibility for complementary paratransit service is valid for [xx] months, through [Insert Expiration Date]. Should you need complementary paratransit service beyond this date, you will need to request a continuation of your eligibility.

We are granting you temporary eligibility because there was a period of time you indicated your current condition would prevent you from using the fixed-route transit service, or the information provided by you and [professional contacted] indicated that there could be a change in your ability to use the fixed-route service after [XX] months as a result of treatment you are receiving; or your application materials indicated that you have the ability to use fixed route transit when provided instruction to use the service. We recommend that you contact [contact person] to enroll in the service. We will determine your ongoing eligibility for complementary paratransit service after you have participated in the travel training program.

Enclosed is a copy of [insert name of a rider's guide], which explains the [name of complementary paratransit service] service and how to use it. The rider's guide includes helpful tips for using the service. If you have any questions about the service, please call our Customer Service office at (305) 809-3910.

In addition to using [name of complementary paratransit service], this letter of eligibility also entitles you to use similar ADA paratransit services at other transit systems across the country as a visitor for up to 21 days per year. Simply provide the transit agency in the city you plan to visit with a copy of this letter to obtain approval to travel as a visitor.

If you have any questions about this determination of eligibility, please call our ADA Paratransit Eligibility office at XXXXXXXX

Sincerely,

Sample Ineligible ADA Paratransit Eligibility Letter

Key West Transit
5701 College Rd, Key West
(305) 809-3910

Date: Month-Date-Year

[Insert Applicant's Name]
[Insert Applicant's Address]
[Insert Applicant's City, State, and Zip]

Re: ADA Paratransit Eligibility Determination

Dear XXXXXX,

Thank you for submitting your application for ADA complementary paratransit service with Key West Transit. We have completed our review of your application, and after careful evaluation pursuant to the Americans with Disabilities Act (ADA) regulations (49 C.F.R. Part 37, Subpart F), we have determined that:

You are **INELIGIBLE** for ADA complementary paratransit service. This means, based on the information provided, we have determined that you are able to use fixed route buses and are not prevented by a disability from using the regular fixed-route transit service.

The basis for our decision is explained on the attached page, Basis for the Determination. If you do not agree with this eligibility determination, you have the right to appeal this decision. We require that you make an appeal. Copies of our appeal policy, as well as an appeal request form, are attached.

Attached is information about Key West Transit fixed-route bus service. Please contact us if we can assist you with using our fixed-route bus service. For information about bus schedules, or for assistance planning trips by bus call our Customer Service office at (305) 809-3910.

If you have any questions about this determination of eligibility, please call our ADA Paratransit Eligibility office at XXXXXXXX

Sincerely,



No-Show and Cancellation Policy

Purpose

This policy ensures that ADA Complementary Paratransit service remains reliable, efficient, and available to all eligible riders. Excessive no-shows and late cancellations reduce system capacity and may prevent other riders from receiving needed trips.

Definitions

- No-Show: A trip where the vehicle arrives on time, waits at least 5 minutes, and the rider does not board.
- Late Cancellation: Any cancellation made less than 1 hours before the scheduled pickup window. Late cancellations are treated the same as a no-show.
- Pickup Window: The scheduled pickup time plus or minus 15 minutes, consistent with ADA guidelines. Riders must be ready to board during this window.
- Beyond the Rider's Control: Situations such as medical emergencies, severe weather, sudden hospitalization, or operator error. These occurrences will not count as no-shows.

Rider Responsibilities

- Be ready to board at the designated pickup location at the start of the pickup window.
- Provide at least 1 hours' notice if canceling a trip.
- Maintain updated contact information so dispatchers can reach you if needed.
- Communicate delays or unexpected circumstances as soon as possible.

How No-Shows Are Determined

A no-show will be recorded if:

- The vehicle arrives within the pickup window,
- The operator waits 5 minutes, and
- The rider does not board or declines the trip.

No-shows or cancels are NOT EXCUSED when the trip is missed for the following reasons:

- The customer did not want to travel today.
- Customer changes their mind about using an appointment.
- The customer did not know or forgot that he/she had a ride scheduled or was supposed to call to cancel.
- The customer got another ride.
- The customer told someone else he/she was not planning to travel (driver, facility, etc.) or someone else scheduled the ride for him/her.
- The customer does not want to ride with a specific driver or passenger or on a specific vehicle.

If the vehicle arrives early, the operator must wait until the start of the pickup window; early arrivals cannot result in a no-show.

No-Show and Late Cancellation Threshold

Key West Transit may review rider behavior when:

- A rider accumulates three (3) no-shows or late cancellations within a 30-day period, and
- These constitute 10% or more of the rider's scheduled trips for that period.

Both conditions must be met for potential suspension.

Notification Process

Before any suspension, the rider will receive:

- A written notice detailing the dates and times of recorded no-shows/late cancellations,
- The proposed suspension length,
- Instructions for requesting a review or submitting an appeal.

Appeal Rights

Riders have the right to appeal any proposed suspension.

- Appeals must be submitted within 20 days of the notice.
- Riders may present evidence, explain circumstances beyond their control, by making a verbal or written appeal.
- Service will continue during the appeal process.

Suspension Guidelines

Occurrence	Number of Days
First occurrence	Warning letter
Second occurrence	7 Days
Third occurrence	14 Days
Subsequent occurrences	30 Days

Suspensions will only apply when the threshold in No-Show and Late Cancellation Threshold section is met.

Trip-by-Trip Review

Key West Transit will review all no-shows and late cancellations upon rider request. Any trip missed due to circumstances beyond the rider's control will be removed from the record.

Appeals Process

The U.S. Department of Transportation (U.S. DOT) regulations for implementing the Americans with Disabilities Act of 1990 (ADA) (49 CFR Part 37) require a public transit agency with ADA paratransit service to have an appeals process as part of its eligibility determination process [49 CFR Part 37, Subpart F, 37.125(g)] and for service suspensions related to a pattern or practice of no-shows [49 CFR, Subpart F, Section 37.125(h)].

Policy & Procedure

Key West Transit has established an appeal process for the following:

- › An applicant for ADA paratransit or an eligible rider recertifying eligibility who is denied eligibility or given conditional or temporary eligibility may appeal the decision.
- › An ADA eligible rider receiving notice of a service suspension due to a pattern or practice of no-shows may appeal the decision.

Submit an Intent to Appeal

The individual appealing, referred to as the appellant, must submit an intent to appeal in writing, and it must be filed within 60 days of notification of the eligibility determination or of a service suspension.

- › The written intent to appeal should be sent:
 - By first class mail to **Assistant Transit Supervisor, Vicente Rodriguez, 5701 College Road Key West, FL, 33040**, or
 - By email to kwdot@cityofkeywest-fl.gov.
- › The written intent to appeal may state the reason(s) for the appeal with supporting information, and this would be helpful for Key West Transit to review the appeal, but this is not required.

Appeals Hearing

Once the intent to appeal is received, Key West Transit will schedule an Appeals Hearing within 30 days.

- › The appellant will be notified in writing of the date, time, and location of the Hearing.
- › The appellant may attend in person along with an attendant or representative if desired; however, attending in person is not required.
- › If the appellant does not attend in person, they may have another person attend as the representative. This also is not required.
- › The appellant may provide before the Hearing or bring to the Hearing any information or evidence, orally or in written form, that supports the appellant's appeal.

Appeals Committee

The appeal will be heard by the Appeals Committee, which is composed of three staff members of Key West Transit. These include the Transit Director, Grant and Project Manager and Support Manager.

Decision

The Appeals Committee will make a decision on the appeal within 30 days of the Appeals Hearing and provide the decision and reasons for the decision to the appellant in writing. If a decision on the appeal has not been made within 30 days after the Appeals Hearing, the appellant will be provided ADA paratransit service until a final decision is made.

Is ADA paratransit provided during the appeals process?

The provision of ADA paratransit from the time when the appeal is received by Key West Transit to the time when a decision on the appeal is made depends on the reason for the appeal:

- › If the appellant is a new applicant for ADA paratransit, no ADA paratransit will be provided until a decision has been made by the Appeals Committee.
- › If the appellant is currently eligible for ADA paratransit and whose recertification is denied or given conditional or temporary eligibility, ADA paratransit will be provided until a decision has been made by the Appeals Committee.
- › If the appellant is appealing service suspension due to a pattern or practice of no-shows, ADA paratransit will be provided until a decision has been made by the Appeals Committee.

Recordkeeping

Documentation related to the appeal and its outcome will be retained for a period of three years, with a record in summary form kept for five years.

Complaint Form & Procedures

Key West Transit periodically receives Americans with Disabilities Act (ADA) complaints from customers or their representatives regarding fixed route and ADA complementary paratransit service operations, policies and procedures. This document outlines the process for recording, investigating, responding to, and maintaining ADA complaints. Alternative formats for this document are available upon request.

Objectives

The objectives of the complaint procedure are:

- › To provide an opportunity for customers to report any policies, procedures or actions by Key West Transit that they believe violate ADA regulations
- › To document and investigate complaints in a timely and thorough manner
- › To provide timely responses to customers communicating the outcome of investigations

Contact Information

ADA complaints are investigated by Multimodal Transportation Coordinator, Ryan Stachurski, who can be contacted at:

City of Key West ADA Coordinator
P.O. Box 1409
Key West, FL 33041
Desk Phone: 305-809-3867

Complaint Process

1. Riders may submit complaint forms to Key West Transit in the following manner:

Telephone: 305-809-3910
Email: kwdot@cityofkeywest-fl.gov
Mail: 5701 College Rd, Key West, FL 33040
In person: Key West Transit
5701 College Rd, Key West, FL 33040
305-809-3910
Monday – Friday, 8 a.m. – 5 p.m.

2. Complaints are taken up to 180 days following the date of an incident. Once the 180-day period has elapsed, complaints will be classified as comments.
3. ADA complaints are received by the Customer Service Coordinator or a transit call-taker and immediately entered into a call log software/spreadsheet. In order for a complaint to be investigated, the complainant or the complainant's representative must provide an address, telephone number or email address. Complaints that do not include contact information will be classified as comments.

4. The Multimodal Transportation Coordinator receives and reviews complaints for completeness and accuracy, and calls (or directs a department staff member to call) the complainant if additional details are needed for the investigation.

Complaint Investigation and Rider Follow-up

1. The Multimodal Transportation Coordinator is responsible for contacting the complainant. Any complaint that alleges discrimination on the basis of disability will be designated as an ADA complaint. The Multimodal Transportation Coordinator is responsible for investigating complaints and following up with the complainant.
2. The Multimodal Transportation Coordinator is responsible for contacting the appropriate Key West Transit manager/operator(s) to obtain information needed in order to complete the investigation of a complaint.
3. Once the investigation is completed, the Multimodal Transportation Coordinator will make a decision regarding the validity of the complaint and what remedial action, if any, will be taken to address the complainant's concerns.
4. The Multimodal Transportation Coordinator will contact the complainant (using the contact method indicated on the "Key West Paratransit Comment Form") to communicate Key West Transit's decision regarding the resolution of the complaint, typically within thirty business days after the investigation is completed.
5. If complainant disagrees with the Multimodal Transportation Coordinator's determination, he/she can appeal the decision in writing within thirty business days of the date of the determination letter. The appeal letter should state the reason(s) the complainant believes the decision is in error. The appeal letter should be mailed to:

City of Key West ADA Coordinator
P.O. Box 1409
Key West, FL 33041
Desk Phone: 305-809-3867

Complaint Tracking and Record Retention

Key West Transit's Transit Assistant Supervisor is responsible for tracking all ADA complaints for the purpose of establishing trends in allegations of discrimination.

Key West Transit's Transit Assistant Supervisor will maintain a summary log of all ADA complaints. In addition, all complaint documents and materials gathered during the investigation are maintained for no less than five years.

FDOT TransCIP reporting requirements

Key West Paratransit Comment Form

Key West Transit is committed to providing customers with safe and reliable transportation services. To file an Americans with Disabilities Act or ADA complaint or comment, please complete and submit this form to Multimodal Transportation Coordinator, Ryan Stachurski, using one of the acceptable methods indicated on page 1 of the Complaint Procedure under Complaint Process.

You may attach to this form any additional written material or other information that you deem relevant.

SECTION I: TYPE OF COMMENT (Choose One)

Compliment ☐

Suggestion ☐

Complaint ☐

Other:

Disability related?

Yes ☐

No ☐

SECTION II: CONTACT INFORMATION

Salutation [Mr./Mrs./Ms., etc.]:

Name:

Rider ID (if applicable):

Street Address:

City, State, ZIP Code:

Phone:

Email:

Accessible format requirements:

Large print ☐

TDD/Relay ☐

Audio recording ☐

Other:

SECTION III: COMMENT DETAILS

Date of occurrence:

Time of Occurrence:

Name/ID of employee(s) or others involved:

Vehicle ID/Route name or number:

Direction of travel:

Location of incident:

Mobility aid used (if any):

If above information is unknown, please provide other descriptive information to help identify the employee:

Description of incident or message:

SECTION IV: FOLLOW UP

What is the best way to reach you (choose one)?

Phone ☐

Email ☐

Mail ☐

If a phone call is preferred, what is the best day and time to reach you?

SECTION V: DESIRED RESPONSE (choose one)

☐ Email

☐ Telephone

☐ U.S. Postal Service

Contact List of Coordinating Providers

CTC Provider	General Service Area	Eligible Trip Purposes	Eligible Riders	Hours of Operation	Contact
Guidance/Care Center (G/CC)	Marathon	Any	Elderly/Senior, Low Income or Disabled	Mon–Fri, 8:30am–4:00pm	Lisa Marciniak (305) 434-7660 3000 41st Street, Ocean, Marathon, Florida 33050
Florida Keys Outreach Coalition (FKOC)	Key West	Any	Facility registered clients	Mon–Fri, 8:30am–5:30pm	Stephen Braddock (305) 293-8189 2221 Patterson Road, Key West, Florida 33040
Florida Keys Children's Shelter (FKCS)	Tavernier	Any	Children	24/7	Alvin Bentley (305) 852-4246 73 High Point Road, Tavernier, Florida 33070
Monroe County Social Services (MCT)	Key West, Big Pine, Marathon, Tavernier	Any	Any	Mon–Fri, 8:00am–5:00pm	Sheryl Graham (305) 292-4510 1100 Simonton Street, Room 1-181, Key West, Florida 33040
Monroe Association for ReMARCable Citizens Inc. (MARC House)	Key West	Any	Facility registered clients	Mon–Fri, 8:00am–4:00pm	Diana Flenard (305) 294-9526 812 Southard Street, Key West, Florida 33040

Source: Monroe County Transportation Disadvantaged Service Plan 2022-2023

Resources

- Disability Rights Educations & Defense Fund (DREDF) Topic Guide on Eligibility for ADA Paratransit, <https://dredf.org/ADAtg/elig.shtml>
- FTA C 4710.1 ADA Guidance, <https://www.transit.dot.gov/regulations-and-programs/fta-circulars/americans-disabilities-act-guidance>
- National Aging & Disability Transportation Center (NADTC) Determining ADA Paratransit Eligibility, <https://www.nadtc.org/resources-publications/resource/determining-ada-paratransit-eligibility/>
- National RTAP ADA Toolkit, <https://www.nationalrtap.org/Toolkits/ADA-Toolkit/>
- National Center for Transit Research (NCTR) Forecasting Paratransit Services Demand - Review and Recommendations (2013), https://digitalcommons.usf.edu/cutr_nctr/105/
- Transir Cooperative Research Program (TCRP) Report 119, *Improving ADA Paratransit Demand Estimation* (2007) <https://doi.org/10.17226/23146>
- TCRP Report 158, *Improving ADA Paratransit Demand Estimation - Regional Modeling* (2012) <https://doi.org/10.17226/22720>
- TCRP Synthesis 133, *Administration of ADA Paratransit Eligibility Appeal Programs* (2018) <https://doi.org/10.17226/25079>
- TCRP Synthesis 135, *ADA Paratransit Service Models* (2018) <https://doi.org/10.17226/25092>